



McDonald Hopkins LLC  
600 Superior Avenue, East  
Suite 2100  
Cleveland, OH 44114

P 1.216.348.5400  
F 1.216.348.5474

Writer's Direct Dial: 216.348.5740  
Email: rblake@mcdonaldhopkins.com

January 27, 2016

**By ECF AND EMAIL**

Hon. Andrew L. Carter, Jr.  
United States District Court  
Southern District of New York  
40 Foley Square, Room 435  
New York, New York 10007

**Re: *United States of America v. Edward Durante, et al.*  
In The United States District Court Southern District of New York  
Case No. S4 15 CR 171 (ALC)**

Dear Judge Carter:

On behalf of my client, Larry Werbel, and with the consent of the government, I am writing to request a two week enlargement of time, from January 27, 2016, until February 10, 2016, to produce one additional financially responsible co-signor to sign Mr. Werbel's bond.

On January 13, 2016, the Court ordered Mr. Werbel released pending trial, on the following conditions: that Mr. Werbel sign a personal recognizance bond in the amount of \$500,000, to be co-signed by two financially responsible persons, and secured by \$100,000 in equity and \$10,000 in cash; that he restrict his travel to the Northern District of Ohio, the Eastern and Southern Districts of New York, and the District of New Jersey; that he surrender his travel documents and make no new applications for such documents; and that he submit to regular pretrial supervision. Your Honor allowed Mr. Werbel until today, January 27, 2016, to satisfy the conditions of his bond.

Mr. Werbel has submitted one co-signor to the U.S. Attorney's Office for consideration, but he has not yet secured a second financially responsible person to sign his bond. To allow Mr. Werbel more time to do so, I am requesting two additional weeks. Additionally, Mr. Werbel has provided the government with evidence of \$100,000 secured in equity on Mr. Werbel's home, in the form of a mortgage granted in favor of the Southern District of New York Clerk of Court. Mr. Werbel has also paid the required \$10,000 in cash.

If Your Honor is inclined to grant this request, I respectfully ask that you memo endorse this letter below. Please do not hesitate to contact me if you have any questions.

Very truly yours,

Richard H. Blake

So Ordered:

HON. ANDREW L. CARTER, JR.

cc:

AUSA Daniel S. Goldman  
AUSA Andrea M. Griswold